

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

ANDREW “ANDY” THOMAS,)	
)	
PLAINTIFF,)	CASE NO.: 1:21-cv-2519-TWP-MJD
)	Judge Tanya Walton Pratt
v.)	Magistrate Judge Mark J. Dinsmore
)	
ooSHIRTS, INC. doing business)	
as www.teechip.com, et al.)	
)	
DEFENDANTS.)	

SUPPLEMENTAL JOINT REPORT ON THE STATUS OF DISCOVERY

Pursuant to the Court’s Order, the parties by and through the undersigned counsel, hereby report on the status of discovery in this matter as follows:

I. Description of All Discovery Completed to Date

Defendant ooShirts, Inc. responded to Plaintiff’s First Set of Interrogatories to Defendant ooShirts, Inc. and Plaintiff’s Second Set of Requests for Production to Defendant ooShirts, Inc. Despite Defendant ooShirts, Inc.’s responses, several issues and disputes remain.

II. Discovery Presently Scheduled or Pending

In light of the change of counsel, Plaintiff granted Defendant ooShirts, Inc. an extension of time up to and including April 17, 2023, to respond to Plaintiff’s First Set of Interrogatories and Second Set of Requests for Production. Defendant ooShirts, Inc. responded on the agreed date, but there are several issues with its responses to the point where its responses must be supplemented. Mr. Huang, Mr. Bishop, and Mr. Crell, on behalf of all defendants, are responsible for completing such discovery. Mr. Maguire, on behalf of Plaintiff, is responsible for handling any discovery issues that may arise.

III. Discovery Disputes Still Pending

Plaintiff's counsel has not had an opportunity to meet and confer with Defendant ooShirts, Inc.'s counsel after Defendant ooShirts, Inc. provided its discovery responses on April 17, 2023. Plaintiff's counsel has now returned from paternity leave, and as of the time of this report, the parties have not had an opportunity to meet and confer. Mr. Maguire, on behalf of Plaintiff, is responsible for completing such discovery. Mr. Huang, Mr. Bishop, and Mr. Crell, on behalf of Defendants, are responsible for resolving any discovery disputes on behalf of those parties.

IV. Discovery that is Planned

In light of Defendant ooShirts, Inc.'s discovery responses, Plaintiff anticipates the deposition of Mr. Lei, Mr. Garcia, Mr. Huang, Mr. Wallraven, and Mai Tran later than previously indicated. Mr. Maguire is responsible for completing discovery on behalf of Plaintiff. Mr. Huang, Mr. Bishop, and Mr. Crell are responsible for completing discovery on behalf of Defendants.

V. Discovery Remaining to be Completed

Due to the outstanding issues with Defendant ooShirts, Inc.'s discovery responses, the parties have yet to complete written discovery. In addition, the parties have yet to conduct depositions in this matter. Plaintiff anticipates depositions of fact witnesses in mid to late May 2023 and a request to extend expert deadlines, if the parties are able to resolve the discovery issues with Defendant's responses in a timely manner. Mr. Maguire, Mr. Huang, Mr. Bishop, and Mr. Crell are responsible for completing discovery in this matter.

VI. Discovery Issues to be Brought to the Attention of the Court

The parties are unaware of any discovery issues to be brought to the Court's attention at this time as the parties have not yet had an opportunity to meet and confer. If the parties are unable

to resolve the discovery dispute after conferring, the parties will alert the Court and ask the Court to intervene.

Approved and submitted by,

/s/ Oliver Maguire

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on this 1st day of May 2023, a copy of the foregoing was filed using the Court's CM/ECF system, which automatically sends notice to all counsel of record.

/s/ Oliver Maguire

Counsel for Plaintiff